

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Serial No.09/820,088
Filing Date March 27, 2001
Inventorship Debique, et al.
Applicant.....Microsoft Corp.
Group Art Unit2167
ExaminerLe, Miranda
Attorney's Docket No. MS1-790US
Title: METADATA UPDATE OF LINKED OBJECTS

APPEAL BRIEF

To: Commissioner for Patents
PO Box 1450
Alexandria, Virginia 22313-1450

From: Lance Sadler (Tel. 509-324-9256x226; Fax 509-323-8979)
Customer No. 22801

Pursuant to 37 C.F.R. §41.37, Applicant hereby submits an appeal brief for application 09/820,088, filed March 27, 2001, within the requisite time from the date of filing the Notice of Appeal. Accordingly, Applicant appeals to the Board of Patent Appeals and Interferences seeking review of the Examiner's rejections.

<u>Appeal Brief Items</u>	<u>Page</u>
(1) Real Party in Interest	3
(2) Related Appeals and Interferences	3
(3) Status of Claims	3
(4) Status of Amendments	3
(5) Summary of Claimed Subject Matter	4
(6) Grounds of Rejection to be Reviewed on Appeal	11
(7) Argument	11
(8) Appendix of Appealed Claims	38
(9) Evidence appendix	54
(10) Related Proceedings appendix	55

(1) Real Party in Interest

The real party in interest is Microsoft Corporation, the assignee of all right, title and interest in and to the subject invention.

(2) Related Appeals and Interferences

Appellant is not aware of any other appeals, interferences, or judicial proceedings which will directly affect, be directly affected by, or otherwise have a bearing on the Board's decision to this pending appeal.

(3) Status of Claims

Claims 1-2, 4-12 and 14-49 stand rejected and are pending in the Application. Claims 1-2, 4-12 and 14-49 are set forth in the Appendix of Appealed Claims on page 19.

(4) Status of Amendments

A first Office Action was issued on July 2, 2003.

A Response was filed on October 21, 2003. Claim 36 was amended.

A Final Office Action was issued on January 14, 2004.

A Response was filed on March 12, 2004. No claims were amended.

An Amendment to the Response of March 12, 2004, was filed on May 14, 2004. Claim 3 was cancelled and claims 1, 9, 17, 19, 21, 27, 34 and 38 were amended.

A Non-final Office Action was issued on July 28, 2004.

A Response was filed on June 6, 2005. Claim 13 was cancelled; claims 8, 26, 27, 33 and 45 were amended; and claims 46-49 were added.

A Final Office Action was issued on November 29, 2005.

A Notice of Appeal was filed on March 21, 2006.

(5) Summary of Claimed Subject Matter

A concise explanation of each of the independent claims is included in this Summary section, including specific reference characters, if any. These specific reference characters are examples of particular elements of the drawings for certain embodiments of the claimed subject matter and the claims are not limited to solely the elements corresponding to these reference characters.

With regard to claim 1, a method comprising: maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media (Fig. 1 (124); Fig. 2 (150, 152); Page 7, line 21, through page 8, line 2); maintaining meta data associated with another plurality of pieces of content (Fig. 1 (124); Fig. 2 (150, 152); Page 7, line 21, through page 8, line 2), wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content (Fig. 1 (116); Page 7, lines 16-17); and altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered (Page 16, lines 13-25; Fig. 3).

With regard to claim 8, one or more computer-readable memories containing a computer program that is executable by a processor to perform acts

of: maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media (Fig. 1 (124); Fig. 2 (150, 152); Page 7, line 21, through page 8, line 2); maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content (Fig. 1 (116, 124); Fig. 2 (150, 152); Page 7, line 21, through page 8, line 2; Page 7, lines 16-17); and altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered (Page 16, lines 13-25; Fig. 3).

With regard to claim 9, one or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, causes the one or more processors to perform the following acts: receiving an identification of a change to be made to meta data corresponding to a particular piece of content on a particular piece of media (Page 30, lines 7-9; Fig. 6); changing, based on the identification, meta data corresponding to the particular piece of content (Page 30, lines 7-20; Fig. 6); identifying one or more other pieces of content associated with the particular piece of content, wherein the other pieces of content are ripped versions of the particular piece of content (Page 12, line 22, through page 13, line 3; Fig. 3); and changing, based on the identification, meta data corresponding to the one or more other pieces of content (Page 16, lines 13-25; Fig. 3).

With regard to claim 17, a system comprising: a disc drive configured to have a removable disc inserted therein, wherein the removable disc includes a

plurality of pieces of content (Fig. 1(114); Page 5, line 20; Page 6, lines 15-17); a local storage device configured to store another plurality of pieces of content, wherein each of the other plurality of pieces of content corresponds to one of the plurality of pieces of content and is a copied version of the data in the corresponding one of the plurality of pieces of content (Fig. 1(110, 116); Page 7, lines 11-17); and a meta data management module, configured to alter meta data associated with one of the other plurality of pieces of content in response to meta data associated with the corresponding one of the plurality of pieces of content being altered (Fig. 1(124); Page 7, line 21, through page 8, line 2; Page 11, lines 14-16).

With regard to claim 19, one or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, cause the one or more processors to perform the following acts: receiving an identification of a plurality of tracks on a disc (Page 32, lines 1-2); obtaining table of contents information from the disc (Fig. 7(302); Page 32, lines 7-8); generating a disc identifier based at least in part on the table of contents information (Fig. 7(304); Page 32, lines 8-10); accessing a local meta data store to identify meta data corresponding to the tracks copied on another disc (Fig. 7(310); Page 32, lines 13-14); and generating a new storage structure, corresponding to the disc, and including the identified meta data (Page 32, lines 11-17).

With respect to claim 21, a method comprising: receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and

wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content (Fig. 7; Page 32, lines 5-17); generating a media identifier corresponding to the new piece of media (Fig. 7(304); Page 32, lines 8-10); identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content (Fig. 7(310); Page 32, lines 1-17); and saving, as meta data corresponding to the new piece of media, the identified meta data (Fig. 7(312); Page 32, lines 14-17).

With respect to claim 26, one or more computer-readable memories containing a computer program that is executable by a processor to perform acts of: receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content (Fig. 7; Page 32, lines 5-17); generating a media identifier corresponding to the new piece of media (Fig. 7(304); Page 32, lines 8-10); identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content (Fig. 7(310); Page 32, lines 1-17); and saving, as meta data corresponding to the new piece of media, the identified meta data (Fig. 7(312); Page 32, lines 14-17).

With respect to claim 27, a method of managing meta data corresponding to media content, the method comprising: maintaining a set of disc identifiers (Page 29, lines 21-24; Page 32, lines 8-10; Fig. 7(304)); for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier (Page 32, lines 11-17); for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object (Page 32, line 11, through page 33, line 2); and associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks (Page 32, line 11, through page 33, line 2).

With respect to claim 33, one or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of: maintaining a set of disc identifiers (Page 29, lines 21-24; Page 32, lines 8-10; Fig. 7(304)); for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier (Page 32, lines 11-17); for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object (Page 32, line 11, through page 33, line 2); and associating, for each of the one or more individual children objects, the set of additional objects with the child object,

wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks (Page 32, line 11, through page 33, line 2).

With respect to claim 34, a computer-readable medium having stored thereon a data structure, comprising: a set of entries identifying objects (Page 12, line 22, through page 13, line 3; Fig.3(302)); another set of entries identifying relationships between selected ones of the objects identified in the set with selected others of the objects (Page 13, lines 20-22; Fig. 3(204)), wherein the selected others of the objects are copies of corresponding ones of the objects (Page 12, line 24, through page 13, line 3); and an additional set of entries identifying meta data associated with individual objects (Page 15, lines 3-11; Fig. 3(206)).

With respect to claim 38, a method comprising: receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium (Fig. 6(280); Page 30, lines 7-9); identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track (Page 11, lines 4-6; Page 30, lines 9-11; Fig. 6(282)); changing, based on the indication, meta data corresponding to the content track (Page 30, lines 17-18; Fig. 6(288)); and changing, based on the indication, meta data corresponding to the file (Fig. 2; Page 11, lines 14-21).

With respect to claim 45, one or more computer-readable memories containing a computer program that is executable by a processor to perform acts of: receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium (Fig. 6(280); Page 30, lines 7-9); identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track (Page 11, lines 4-6; Page 30, lines 9-

11; Fig. 6(282)); changing, based on the indication, meta data corresponding to the content track (Page 30, lines 17-18; Fig. 6(288)); and changing, based on the indication, meta data corresponding to the file (Fig. 2; Page 11, lines 14-21).

With respect to claim 46, one or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of: maintaining a set of disc identifiers (Page 29, lines 21-24; Page 32, lines 8-10; Fig. 7(304)); for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier (Page 32, lines 11-17), wherein one or more disc identifiers in the set of disc identifiers is one of a compact disc (CD) identifier and a digital versatile disc (DVD) identifier (Page 11, lines 15-20); for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object (Page 32, line 11, through page 33, line 2); associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks (Page 32, line 11, through page 33, line 2); propagating, to the set of additional objects, any changes made to meta data corresponding to the child object (Fig. 3; Page 16, lines 13-14; Page 32, line 24, through page 33, line 2); and receiving an indication to change meta data associated with one track on the disc (Fig. 6(280); Page 30, lines 7-9); altering, in response to the indication, meta data associated with the child object corresponding to the one track (Fig. 6(288); Page 30, lines 17-18); and altering, in

response to the indication, meta data associated with the additional object corresponding to the child object corresponding to the track (Fig. 2; Page 11, lines 14-21).

(6) Grounds of Rejection to be Reviewed on Appeal

Claims 1-2, 4-12, 14-31, 33-42 and 44-45 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,760,721 to Chasen, et al. (hereinafter "Chasen").

Claims 32 and 43 stand rejected under 35 U.S.C. § 103(a) as being obvious over Chasen in view of U.S. Patent No. 6,505,160 to Levy, et al. (hereinafter "Levy").

Claims 46-49 stand rejected under 35 U.S.C. § 103(a) as being obvious over Chasen in view of U.S. Patent Pub. No. 2005/0047756 to Evans, et al. (hereinafter "Evans").

(7) Argument

A. The rejections under 35 U.S.C. § 102(e) fail to establish that Chasen anticipates the claims against which it is cited.

Applicant respectfully submits that the Office has not established that the claims rejected under 35 U.S.C. § 102(e) are anticipated by Chasen. The discussion below proceeds as follows. First, a section entitled "The § 102 Standard" is provided and describes the standard by which claim anticipation is established. Following this, a section entitled "The Chasen Reference" is provided and describes salient aspects of Chasen's disclosure. Finally, a section entitled

"The Claims" is provided and presents Applicant's reasoning as to why the Office has not established that Chasen anticipates the rejected claims.

The § 102 Standard

Applicant notes the requirements of MPEP § 2131, which states that "[to anticipate a claim, the reference must teach every element of the claim]." This section further states that

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).... "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Accordingly, the reference must contain, within its four corners, exactly the subject matter of the claim, as it appears in the claim, in order to support a valid finding of anticipation. The absence from a cited § 102 reference of *any* claimed element negates a finding of anticipation. See, e.g., Kloster Speedsteel AB, et al. v. Crucible, Inc., et al., 793 F.2d 1565, 230 USPQ 81 (Fed. Cir. 1986).

The Chasen Reference

Chasen describes a system and method that allow users to access, manage and edit information about content, or metadata. According to Chasen, a database of metadata is queried to produce a set of metadata query results. The query results are then arranged in a hierarchical representation based at least upon a

subset of a predefined hierarchy of metadata categories. The hierarchical representation is then presented to the user in a graphical display.

Chasen further discloses the ability to update the above-mentioned graphical display of metadata. To do so, a change to at least a portion of the subset of metadata is received and displayed to the user. A determination is then made as to the portions of the hierarchical display of metadata that are affected by the change and those portions are updated. The updated hierarchical representation is then displayed to the user.

Chasen further discloses a method of obtaining information about content data where the information is stored in a database and displayed to the user. The method involves obtaining an identifier related to a set of content data and creating a request for information about the set of content data using the identifier. The request is then processed and a set of information is received according to the request. The requested information is then stored in a database.

The Claims

Claim 1

Claim 1 recites a method comprising:

- maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media;
- maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content; and
- altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered.

In making out the rejection of this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest every element of this claim.

First, Chasen fails to disclose the feature of maintaining meta data associated with *another* plurality of *pieces of content*, wherein each of the other plurality of pieces of content is a *ripped version* of a respective one of a plurality of pieces of content in the corresponding one of the plurality of pieces of content. The Office argues that Chasen teaches a ripped version of content at column 17, line 20. Office Action of 11/29/2005, page 3. Applicant will provide below an expanded excerpt from this section to further clarify the differences between the subject matter of the present claim and that disclosed by Chasen.

If the content data is stored in an encoded data file such as, for example an MP3 file, the encoded data file is checked for metadata information. If the information is with the content data, the add metadata process 218 proceeds to a state 760 wherein the add metadata process 218 obtains a copy of the information and saves the information in the metadata database 232 and proceeds to the end state 770. If the information is not with the content data, the add metadata process 218 proceeds to a state 740. Chasen, column 17, lines 18-26.

Applicant will also provide an excerpt from Applicant's specification to further clarify what is meant by the term "ripped":

In addition to playing back media content directly from the source CD, some applications also allow songs to be copied from the source CD and stored as separate files on a local hard drive of the computer, such as in an MP3 or WMA format. This process is commonly referred to as "*ripping*". These locally stored files can then be played back at a subsequent time

directly from the local hard drive without the presence of the source CD in the CDROM drive. Specification, page 1, line 24, through page 2, line 4 (emphasis added).

Thus, the process of ripping involves copying the actual media content from one location (e.g. a CD) to another location (e.g. a hard drive) so that two versions of the actual media content (not just metadata) exist in two different storage locations. In contrast, the section of Chasen cited by the Office merely discloses that the content data may be stored as an MP3 file and that the add metadata process may therefore obtain a copy of the information (i.e. metadata) from the MP3 file in order to update the metadata database. Thus, Chasen teaches that *metadata* associated with content may be copied, but nowhere teaches that the *actual content itself* is copied such that two versions of the actual media content are maintained by the same method. The mere fact that Chasen discloses the possibility of content existing as an MP3 file does not require that the content was ripped from another source or that two versions of the actual media content are maintained. Nowhere does Chasen disclose or suggest this feature of the present claim. In point of fact, Chasen teaches away from any such notion.

Further, Chasen fails to disclose or suggest the feature of altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered. As explained above, Chasen neither discloses nor suggests one of a plurality of pieces of content that corresponds to one of another plurality of pieces of content (i.e. two versions of one piece of content). Accordingly, it would be impossible for Chasen to disclose or suggest that the metadata for one

version is altered in response to the metadata for the other version being altered. This feature is entirely absent from Chasen.

Accordingly, Chasen fails to disclose or suggest every element of this claim and this claim is not anticipated by Chasen. This claim is allowable.

Claims 2 and 4-7

Claims 2 and 4-7 depend from claim 1 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 1, are neither disclosed nor suggested by the reference of record.

Claim 8

Claim 8 recites one or more computer-readable memories containing a computer program that is executable by a processor to perform the acts of:

- maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media;
- maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content; and
- altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered.

In making out the rejection of this claim, the Office argues that its subject matter is anticipated by Chasen. However, as explained above with respect to claim 1, Chasen fails to disclose or suggest the features of:

- maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content; and
- altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered.

These features are simply missing from Chasen. Accordingly, Chasen fails to disclose or suggest all of the features of this claim. This claim is allowable.

Claim 9

Claim 9 recites one or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, causes the one or more processors to perform the following acts:

- receiving an identification of a change to be made to meta data corresponding to a particular piece of content on a particular piece of media;
- changing, based on the identification, meta data corresponding to the particular piece of content;
- identifying one or more other pieces of content associated with the particular piece of content, wherein the other pieces of content are ripped versions of the particular piece of content; and
- changing, based on the identification, meta data corresponding to the one or more other pieces of content.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, and as explained above, Chasen neither discloses nor suggests the feature of other pieces of content that are ripped versions of a particular piece of content. Chasen merely discloses that a piece of content may be found in one of several forms, including MP3 form (column 17, lines 18-20) or on a CD (column 17, lines 16-18). Nowhere, however, does Chasen disclose or suggest *two different versions* of a particular piece of content and that one version is a ripped version of another.

Further, since Chasen fails to teach two versions of a piece of content, it would be impossible for Chasen to disclose or suggest the feature of changing meta data corresponding to the one or more *other* pieces of content (i.e. the ripped version) based on the identification of a change to be made to the meta data corresponding to a particular piece of content (i.e. the original version). This feature is simply absent from Chasen.

Chasen fails to disclose or suggest all of the features of this claim and does not anticipate this claim. This claim is allowable.

Claims 10-12 and 14-16

Claims 10-12 and 14-16 depend from claim 9 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 9, are neither disclosed nor suggested by the reference of record.

Claim 17

Claim 17 recites a system comprising:

- a disc drive configured to have a removable disc inserted therein, wherein the removable disc includes a plurality of pieces of content;
- a local storage device configured to store another plurality of pieces of content, wherein each of the other plurality of pieces of content corresponds to one of the plurality of pieces of content and is a copied version of the data in the corresponding one of the plurality of pieces of content; and
- a meta data management module, configured to alter meta data associated with one of the other plurality of pieces of content in response to meta data associated with the corresponding one of the plurality of pieces of content being altered.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

First, nowhere does Chasen disclose or suggest the features of:

- a removable disc includes a plurality of pieces of content; and
- a local storage device configured to store another plurality of pieces of content, wherein each of the other plurality of pieces of content corresponds to one of the plurality of pieces of content and is a copied version of the data in the corresponding one of the plurality of pieces of content.

In its argument, the Office cites to column 17, line 19, and states that “an MP3 file is a copied version of an audio file (track on CD) because they have different formats...” Office Action of 11/29/2005, pages 4-5. This section and the surrounding text is excerpted below for the convenience of the Office:

If the information is not in the local database, the add metadata process 218 proceeds to a state 730. In state 730, the add metadata process 218 determines whether the information is located with the content data. For example, if the content data is stored on a CD-ROM, then CD-ROM is

checked for metadata information. If the content data is stored in an encoded data file such as, for example an MP3 file, the encoded data file is checked for metadata information. If the information is with the content data, the add metadata process 218 proceeds to a state 760 wherein the add metadata process 218 obtains a copy of the information and saves the information in the metadata database 232 and proceeds to the end state 770. Chasen, column 17, lines 12-25.

First, the argument by the Office that an MP3 file is a copied version of a track on CD because they have different formats is inaccurate. An MP3 file may be created in a variety of ways, only one of which is conversion from a CD music file. Chasen merely teaches that content *may* be stored on a CD-ROM or *may* be stored as an MP3. Chasen does not specify that content is maintained on *both* a CD and an MP3, or that one medium contains a copy of content that exists on another medium. The section of Chasen excerpted above simply discloses that the add metadata process can obtain a copy of *metadata* from a particular source, whether it be a CD file, an MP3 file, or other storage medium or location. Accordingly, Chasen fails to disclose or suggest these features of the present claim.

Further, Chasen fails to disclose or suggest the feature of:

- a meta data management module, configured to alter meta data associated with one of the other plurality of pieces of content in response to meta data associated with the corresponding one of the plurality of pieces of content being altered.

In order for Chasen to disclose or suggest this feature, Chasen would have to disclose or suggest two distinct pieces of content – one of the “plurality of pieces of content” and one of the “*other* plurality of pieces of content.” Further,

the one of the other plurality of pieces of content would have to be a copy of the one of the plurality of pieces of content, as required by the previous element in the present claim. However, as explained above, Chasen fails to disclose two pieces of content where one piece is a copy of another. Indeed, Chasen discloses that *metadata* may be copied from one location to another (see excerpt above), but nowhere does it disclose or suggest that metadata associated with one version of content (one of the *other* plurality of pieces of content) is altered in response to the metadata for another version of content (one of the plurality of pieces of content) being altered. This feature is also absent from the cited reference.

Accordingly, Chasen fails to disclose or suggest all of the features of the present claim and does not anticipate this claim. This claim is allowable.

Claim 18

Claim 18 depends from claim 17 and is thus allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 17, are neither disclosed nor suggested by the reference of record.

Claim 19

Claim 19 recites one or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, cause the one or more processors to perform the following acts:

- receiving an identification of a plurality of tracks on a disc;
- obtaining table of contents information from the disc;

- generating a disc identifier based at least in part on the table of contents information;
- accessing a local meta data store to identify meta data corresponding to the tracks copied on another disc; and
- generating a new storage structure, corresponding to the disc, and including the identified meta data.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, Chasen fails to disclose or suggest the feature of accessing a local meta data store to identify meta data corresponding to the tracks copied on another disc. As explained above, Chasen does not teach that different versions of tracks (i.e. media content) are maintained. Chasen simply teaches that wherever a piece of content may reside, the *metadata* for that content can be retrieved and incorporated into a metadata database. See, e.g., Chasen at column 17, lines 12-25.

Further, since Chasen fails to disclose or suggest this feature, it would be virtually impossible for Chasen to disclose or suggest the feature of generating a new storage structure, corresponding to the disc, and including the identified meta data. This feature logically depends from the previous feature of a local meta data store to identify meta data corresponding to the tracks *copied on another disc*. However, as explained above, the latter feature is neither disclosed nor suggested by Chasen.

Accordingly, Chasen fails to disclose or suggest all of the features of the present claim and therefore does not anticipate this claim. This claim is allowable.

Claim 20

Claim 20 depends from claim 19 and is thus allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 19, are neither disclosed nor suggested by the reference of record.

Claim 21

Claim 21 recites a method comprising:

- receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content;
- generating a media identifier corresponding to the new piece of media;
- identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content; and
- saving, as meta data corresponding to the new piece of media, the identified meta data.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, Chasen fails to disclose or suggest the feature of

- receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are

selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content.

The Office cites to Chasen at column 16, line 59, through column 17, line 47, and column 6, lines 7-63, as disclosing this feature of the present claim. However, as explained above, Chasen neither discloses nor suggests the feature of two distinct pieces of content wherein one piece of content is a copied version of the other. The sections of Chasen cited by the Office merely disclose that *content metadata* can be copied from one location to a metadata database. Nowhere does Chasen disclose or suggest one or more other pieces of *content* that include *copied versions* of the plurality of pieces of content.

Accordingly, Chasen fails to disclose or suggest all of the features of the present claim and therefore does not anticipate this claim. This claim is allowable.

Claims 22-25

Claims 22-25 depend from claim 21 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those of claim 21, are neither disclosed nor suggested by the reference of record.

Claim 26

Claim 26 recites one or more computer-readable memories containing a computer program that is executable by a processor to perform acts of:

- receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content;
- generating a media identifier corresponding to the new piece of media;
- identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content; and
- saving, as meta data corresponding to the new piece of media, the identified meta data.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, and as explained with respect to claim 21, Chasen neither discloses nor suggests the feature of:

- wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content.

Among others, the feature of other pieces of content that include copied versions of the plurality of pieces of content is simply missing from Chasen. As explained above, Chasen discloses that *metadata* is copied from one location to another, but not that the *content itself* is copied.

Accordingly, Chasen fails to disclose or suggest all of the features of the present claim and does not anticipate this claim. This claim is allowable.

Claim 27

Claim 27 recites a method of managing meta data corresponding to media content, the method comprising:

- maintaining a set of disc identifiers;
- for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier;
- for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object; and
- associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, Chasen fails to disclose or suggest the feature of associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks. The Office cites to the figure in columns 13 and 14 as disclosing this feature, as well as column 16, line 59, through column 17, line 47, and column 11, line 1, through column 12, line 65.

Referring to the cited figure, this figure simply represents the organization of metadata into different groupings. The Office points out that this figure contains the track name “Bird” more than one time. However, as explained by Chasen, “[t]he lowest-level nodes of the master tree represent *audio metadata of individual audio tracks*, while the other nodes represent groupings (or sub-groupings) of audio tracks.” Column 3, lines 61-64 (emphasis added). Accordingly, the presence of multiple instances of a track name in the groupings tree merely indicates that the *audio metadata* for a particular track may be found in multiple locations. This does not indicate that the *track itself* has been copied to another location.

Accordingly, Chasen fails to teach at least this feature of the present claim and this claim is not anticipated by Chasen. This claim is allowable.

Claims 28-32

Claims 28-32 depend from claim 27 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those of claim 27, are neither disclosed nor suggested by the reference of record.

In addition, to the extent that claim 27 is allowable, the further rejection of claim 32 under 35 U.S.C. § 103(a) as being obvious over Chasen in view of Levy is not seen to add anything of significance. Under the § 103 standard, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. However, as explained above, Chasen fails to disclose or suggest all of the features of claim 27. Accordingly, the further addition of Levy cannot

establish a *prima facie* case of obviousness since all of the features in this claim are not disclosed or suggested by the cited references. This claim is allowable.

Claim 33

Claim 33 recites one or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of:

- maintaining a set of disc identifiers;
- for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier;
- for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object; and
- associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that, as explained above, Chasen fails to disclose or suggest the feature of associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks. This feature is simply absent from the disclosure of Chasen.

Accordingly, Chasen fails to anticipate this claim and this claim is allowable.

Claim 34

Claim 34 recites a computer-readable medium having stored thereon a data structure, comprising:

- a set of entries identifying objects;
- another set of entries identifying relationships between selected ones of the objects identified in the set with selected others of the objects, wherein the selected others of the objects are copies of corresponding ones of the objects; and
- an additional set of entries identifying meta data associated with individual objects.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest all of the features of this claim.

Specifically, Chasen fails to disclose or suggest the feature of another set of entries identifying *relationships* between selected ones of the objects identified in the set with selected others of the objects, wherein the selected others of the objects are *copies* of corresponding ones of the objects. The Office cites to the metadata tree found in Chasen at columns 13-14 as teaching the subject matter of this claim. Nowhere, however, does this metadata tree contain objects that identify *relationships* between two objects, where the one object is a *copy* of the other. While this tree may contain specific nodes and copies of the specific nodes, it fails to identify the relationships between the specific nodes *and their copies*.

For example, the node "Bird" occurs three times in the metadata tree. However, nowhere in this tree is there any indication of the *relationship between* these three occurrences of the node "Bird". This feature is simply missing from Chasen.

Accordingly, Chasen fails to disclose or suggest all of the features of this claim. This claim is allowable.

Claims 35-37

Claims 35-37 depend from claim 34 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those of claim 34, are neither disclosed nor suggested by the reference of record.

Claim 38

Claim 38 recites a method comprising:

- receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium;
- identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track;
- changing, based on the indication, meta data corresponding to the content track; and
- changing, based on the indication, meta data corresponding to the file.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. Applicant respectfully disagrees and submits that Chasen fails to disclose or suggest at least the following features of the present claim.

First, Chasen fails to disclose or suggest the feature of identifying a file associated with a content track, wherein the file stores a copied version of the data in the content track. As explained above, Chasen discloses that certain portions of metadata, including root nodes that contain metadata associated with specific tracks, can be copied from one location and pasted into another. See Chasen at column 15, lines 8-20. However, nowhere does Chasen disclose or suggest that copies of the actual contents of the tracks themselves are maintained. This feature is absent from the disclosure of Chasen.

Further, Chasen fails to disclose or suggest the feature of changing, based on an indication, meta data corresponding to the file (wherein the indication is that of a change to be made to meta data corresponding to a content track associated with a particular medium). The file recited in this feature refers back to the previous feature of a file associated with the content track, wherein the file stores a ***copied version*** of the data in the content track. As explained above, Chasen fails to disclose or suggest maintaining a file that is a copied version of the data in a content track. Accordingly, it would be virtually impossible for Chasen to teach changing the metadata corresponding to such a file. This feature is also absent from Chasen's disclosure.

Accordingly, Chasen fails to disclose or suggest all of the features of this claim and this claim is not anticipated. This claim is allowable.

Claims 39-44

Claims 39-44 depend from claim 38 and thus are allowable as depending from an allowable base claim. These claims are also allowable for their own

recited features which, in combination with those recited in claim 38, are neither disclosed nor suggested by the reference of record.

In addition, to the extent that claim 38 is allowable, the further rejection of claim 43 under 35 U.S.C. § 103(a) as being obvious over Chasen in view of Levy is not seen to add anything of significance. Under the § 103 standard, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. However, as explained above, Chasen fails to disclose or suggest all of the features of claim 38. Accordingly, the further addition of Levy cannot establish a *prima facie* case of obviousness since all of the features in this claim are not disclosed or suggested by the cited references.

Claim 45

Claim 45 recites one or more computer-readable memories containing a computer program that is executable by a processor to perform acts of:

- receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium;
- identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track;
- changing, based on the indication, meta data corresponding to the content track; and
- changing, based on the indication, meta data corresponding to the file.

In rejecting this claim, the Office argues that its subject matter is anticipated by Chasen. However, as explained with respect to claim 38, Chasen fails to disclose or suggest the features of: identifying a file associated with the

content track, wherein the file stores a copied version of the data in the content track; and changing, based on the indication, meta data corresponding to the file. These features are simply absent from Chasen.

Accordingly, Chasen fails to disclose or suggest all of this claims recited features and this claim is not anticipated. This claim is allowable.

- B. The rejections under 35 U.S.C. §103(a) over Chasen and Evans fail because the Office has failed to establish a *prima facie* case of obviousness.**

The §103 Standard

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, ***the prior art reference (or references when combined) must teach or suggest all the claim limitations.*** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)

The Claims

Claim 46

Claim 46 recites one or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of:

- maintaining a set of disc identifiers;
- for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier, wherein one or more disc identifiers in the set of disc identifiers is one of a compact disc (CD) identifier and a digital versatile disc (DVD) identifier;
- for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object;
- associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks;
- propagating, to the set of additional objects, any changes made to meta data corresponding to the child object; and
- receiving an indication to change meta data associated with one track on the disc;
- altering, in response to the indication, meta data associated with the child object corresponding to the one track; and
- altering, in response to the indication, meta data associated with the additional object corresponding to the child object corresponding to the track.

In rejecting this claim, the Office argues that its subject matter is obvious over Chasen in view of Evans. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness with respect to

this claim for at least the reason that the cited combination of references fails to disclose or suggest all of this claims recited features.

Specifically, Chasen and Evans fail to disclose or suggest the features of:

- maintaining a set of disc identifiers;
- for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier, wherein one or more disc identifiers in the set of disc identifiers is one of a compact disc (CD) identifier and a digital versatile disc (DVD) identifier;

For the feature of maintaining a set of disc identifiers, the Office cites to the CDPlayer.ini file mentioned in Chasen at column 17, line 6. An excerpt from this section is provided below:

In state 720, the add metadata process 218 determines whether the information is located in a local database. The local database may be, for example the CDPlayer.ini file as well as any other database or file of metadata that may be stored on or accessed by the add metadata process 218. Chasen, column 17, lines 3-8.

This section discusses that the CDPlayer.ini file might contain metadata that can be used in the add metadata process. However, nowhere does this section (or the rest of Chasen) disclose or suggest that a *set of disc identifiers* is maintained.

Further, since Chasen fails to disclose maintaining a set of disc identifiers, it would be virtually impossible for Chasen to disclose or suggest the feature of *for each disc identifier*, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the

disc identifier. The latter feature presupposes the existence of the former and could not function without it. In other words, without a set of disc identifiers, a set of corresponding children objects cannot be maintained for each disc identifier. This feature is simply absent from the cited references.

Finally, neither Chasen nor Evans discloses or suggests the feature of

- associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a *copy of an associated one of the tracks....*

In its argument that Chasen discloses this feature, the Office states that “[i]t should be noted that Bird track belongs to YY object is a copy of Bird track which belongs to A object, wherein the YYY, A nodes correspond to the additional objects, see figure in col. 13 and col. 14.” Office Action of November 29, 2005, at page 18. However, as explained above with respect to claim 27, the lowest nodes of the cited figure correspond to the *audio metadata* of individual tracks, not to the *actual data of the tracks themselves*. Accordingly, Chasen discusses that the nodes representing metadata may be copied from one location to another (e.g. from one play list to another.) However, nowhere does Chasen disclose or suggest that the *actual tracks themselves* are copied by the metadata management system of Chasen. This feature is also absent from Chasen.

Accordingly, and at least for the reasons discussed above, the Office has failed to establish a *prima facie* case of obviousness with respect to this claim. This claim is allowable.

Claims 47-49

Claims 47-49 depend from claim 46 and are thus allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 46, are neither disclosed nor suggested by the references of record.

Conclusion

The Office has not established that the claims are anticipated and has failed to establish a *prima facie* case of obviousness. Accordingly, Applicant respectfully requests that the rejections be overturned and that the pending claims be allowed to issue.

Respectfully Submitted,

Dated: 5/19/06

By: 

Lance R. Sadler
Lee & Hayes, PLLC
Reg. No. 38,605
(509) 324-9256 ext. 226

(8) Appendix of Appealed Claims

1. (Previously Presented) A method comprising:
maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media;
maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content; and
altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered.
2. (Original) A method as recited in claim 1, wherein each of the plurality of pieces of content is a track of a compact disc (CD).
3. (Canceled)
4. (Original) A method as recited in claim 1, wherein each of the other plurality of pieces of content is stored on a local hard drive.
5. (Original) A method as recited in claim 1, further comprising:
receiving an identification of a set of content selected from the plurality of pieces of content;

obtaining table of contents information from a disc on which all of the set of content is stored;

generating a disc identifier based at least in part on the table of contents information;

identifying meta data corresponding to the set of content; and

generating a new storage structure, corresponding to the disc, and including the identified meta data.

6. (Original) A method as recited in claim 1, further comprising:

maintaining a set of disc identifiers;

for each disc identifier, maintaining a set of children objects, wherein each of the children objects corresponds to one of the plurality of pieces of content; and

for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to one of the other plurality of pieces of content.

7. (Original) A method as recited in claim 1, wherein the meta data is stored on a computer-readable medium having a data structure comprising:

a set of entries identifying objects, where each of the plurality of pieces of content corresponds to an object;

another set of entries identifying relationships between selected ones of the objects identified in the set with selected others of the objects; and

an additional set of entries identifying meta data associated with individual objects.

8. (Previously Presented) One or more computer-readable memories containing a computer program that is executable by a processor to perform the acts of:

maintaining meta data associated with a plurality of pieces of content stored on a plurality of pieces of media;

maintaining meta data associated with another plurality of pieces of content, wherein each of the other plurality of pieces of content is a ripped version of a respective one of the plurality of pieces of content in the corresponding one of the plurality of pieces of content; and

altering the meta data associated with one of the other plurality of pieces of content in response to the meta data associated with the corresponding one of the plurality of pieces of content being altered.

9. (Previously Presented) One or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, causes the one or more processors to perform the following acts:

receiving an identification of a change to be made to meta data corresponding to a particular piece of content on a particular piece of media;

changing, based on the identification, meta data corresponding to the particular piece of content;

identifying one or more other pieces of content associated with the particular piece of content, wherein the other pieces of content are ripped versions of the particular piece of content; and

changing, based on the identification, meta data corresponding to the one or more other pieces of content.

10. (Original) One or more computer-readable media as recited in claim 9, wherein the particular piece of content on the particular piece of media comprises a particular song on a particular compact disc (CD).

11. (Original) One or more computer-readable media as recited in claim 9, wherein the identification includes new meta data and wherein changing the meta data corresponding to the particular piece of content comprises overwriting any previous meta data corresponding to the particular piece of content with the new meta data.

12. (Original) One or more computer-readable media as recited in claim 9, wherein the particular piece of content comprises an audio track and wherein the other pieces of content comprise different versions of the audio track.

13. (Canceled)

14. (Original) One or more computer-readable media as recited in claim 9, wherein original meta data associated with the particular piece of content

comprises meta data received from a remote server, and wherein the change to be made to the meta data corresponding to the particular piece of content comprises new meta data received from a user.

15. (Original) One or more computer-readable media as recited in claim 9, wherein the plurality of instructions further causes the one or more processors to perform the following acts:

receiving another identification of a change to be made to meta data, wherein the other identification is a change to be made to one of the other pieces of content;

changing, based on the other identification, the meta data corresponding to the one of the other pieces of content;

changing, based on the identification, the meta data corresponding to the particular piece of content; and

changing, based on the other identification, the meta data corresponding to the others of the one or more other pieces of content.

16. (Original) One or more computer-readable media as recited in claim 9, wherein the plurality of instructions further causes the one or more processors to perform the following acts:

maintaining an indication of a source of the change to the meta data corresponding to the particular piece of content;

maintaining an indication of a source of the change to the meta data corresponding to each of the one or more other pieces of content;

receiving an identification of another change to be made to meta data corresponding to the particular piece of content;

checking whether the source of the change to the meta data corresponding to the particular piece of content was a user;

changing, based on the identification of the other change, meta data corresponding to the particular piece of content if the source of the change to the meta data corresponding to the particular piece of content was the user;

checking whether the source of the change to the meta data corresponding to the one or more other pieces of contents was the user; and

changing, based on the identification of the other change, meta data corresponding to the one or more other pieces of content if the source of the change to the meta data corresponding to the one or more other pieces of contents was the user.

17. (Previously Presented) A system comprising:

a disc drive configured to have a removable disc inserted therein, wherein the removable disc includes a plurality of pieces of content;

a local storage device configured to store another plurality of pieces of content, wherein each of the other plurality of pieces of content corresponds to one of the plurality of pieces of content and is a copied version of the data in the corresponding one of the plurality of pieces of content; and

a meta data management module, configured to alter meta data associated with one of the other plurality of pieces of content in response to meta data

associated with the corresponding one of the plurality of pieces of content being altered.

18. (Original) A system as recited in claim 17, wherein the local storage device is further configured to store both meta data associated with the plurality of pieces of content and meta data associated with the other plurality of pieces of content.

19. (Previously Presented) One or more computer-readable media having stored thereon a plurality of instructions that, when executed by one or more processors of a computer, cause the one or more processors to perform the following acts:

receiving an identification of a plurality of tracks on a disc;

obtaining table of contents information from the disc;

generating a disc identifier based at least in part on the table of contents information;

accessing a local meta data store to identify meta data corresponding to the tracks copied on another disc; and

generating a new storage structure, corresponding to the disc, and including the identified meta data.

20. (Original) One or more computer-readable media as recited in claim 19, wherein the plurality of instructions further cause the one or more

processors to save an indication of a relationship between the plurality of tracks on the disc and corresponding to tracks associated with the other disc.

21. (Previously Presented) A method comprising:

receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content;

generating a media identifier corresponding to the new piece of media;

identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content; and

saving, as meta data corresponding to the new piece of media, the identified meta data.

22. (Original) A method as recited in claim 21, wherein the new piece of media comprises a compact disc (CD).

23. (Original) A method as recited in claim 21, wherein each of the plurality of pieces of content comprises a song.

24. (Original) A method as recited in claim 21, wherein generating the media identifier comprises:

obtaining table of contents information for the new piece of media; and
calculating, based at least in part on the table of contents information, the media identifier corresponding to the new piece of media.

25. (Original) A method as recited in claim 21, further comprising saving an indication of a relationship between content on the new piece of media and the corresponding one or more other pieces of media.

26. (Previously Presented) One or more computer-readable memories containing a computer program that is executable by a processor to perform acts of:

receiving a notification of a new piece of media, wherein the new piece of media includes a plurality of pieces of content that are selected by a user for inclusion on the new piece of media, and wherein the user selection is based on one or more other pieces of content associated with one or more other pieces of media, and wherein further the one or more other pieces of content include copied versions of the plurality of pieces of content;

generating a media identifier corresponding to the new piece of media;

identifying, from a meta data store, meta data corresponding to the plurality of pieces of content and associated with the one or more other pieces of content;
and

saving, as meta data corresponding to the new piece of media, the identified meta data.

27. (Previously Presented) A method of managing meta data corresponding to media content, the method comprising:

maintaining a set of disc identifiers;

for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier;

for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object; and

associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks.

28. (Original) A method as recited in claim 27, further comprising associating meta data with each child object and each additional object.

29. (Original) A method as recited in claim 27, further comprising propagating, to the set of additional objects, any changes made to meta data corresponding to the child object.

30. (Original) A method as recited in claim 27, further comprising:

receiving an indication to change meta data associated with one track on the disc;

altering, in response to the indication, meta data associated with the child object corresponding to the one track; and

altering, in response to the indication, meta data associated with the additional object corresponding to the child object corresponding to the track.

31. (Original) A method as recited in claim 27, wherein one or more disc identifiers in the set of disc identifiers is a compact disc (CD) identifier.

32. (Original) A method as recited in claim 27, wherein one or more disc identifiers in the set of disc identifiers is a digital versatile disc (DVD) identifier.

33. (Previously Presented) One or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of:

maintaining a set of disc identifiers;

for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier;

for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object; and

associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks.

34. (Previously Presented) A computer-readable medium having stored thereon a data structure, comprising:

a set of entries identifying objects;

another set of entries identifying relationships between selected ones of the objects identified in the set with selected others of the objects, wherein the selected others of the objects are copies of corresponding ones of the objects; and

an additional set of entries identifying meta data associated with individual objects.

35. (Original) A computer-readable medium as recited in claim 34, wherein each set of entries is implemented as a different table in a database.

36. (Previously Presented) A computer-readable medium as recited in claim 34, wherein the set of entries also associates the objects with identifiers.

37. (Original) A computer-readable medium as recited in claim 34, wherein the other set of entries identifies the relationships based on the identifiers associated with the objects.

38. (Previously Presented) A method comprising:

receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium;

identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track;

changing, based on the indication, meta data corresponding to the content track; and

changing, based on the indication, meta data corresponding to the file.

39. (Original) A method as recited in claim 38, wherein the content track comprises an audio track.

40. (Original) A method as recited in claim 38, wherein the content track comprises an audio/video track.

41. (Original) A method as recited in claim 38, wherein the content track comprises a video track.

42. (Original) A method as recited in claim 38, wherein the particular medium comprises a particular compact disc (CD).

43. (Original) A method as recited in claim 38, wherein the particular medium comprises a particular digital versatile disc (DVD).

44. (Original) A method as recited in claim 38, wherein the particular medium comprises a particular optical disc.

45. (Previously Presented) One or more computer-readable memories containing a computer program that is executable by a processor to perform acts of:

receiving an indication of a change to be made to meta data corresponding to a content track associated with a particular medium;

identifying a file associated with the content track, wherein the file stores a copied version of the data in the content track;

changing, based on the indication, meta data corresponding to the content track; and

changing, based on the indication, meta data corresponding to the file.

46. (Previously Added) One or more computer-readable memories containing a computer program that is executable by a processor to manage meta data corresponding to media content by performing acts of:

maintaining a set of disc identifiers;

for each disc identifier, maintaining a set of corresponding children objects, wherein each of the children objects corresponds to a track on the disc associated with the disc identifier, wherein one or more disc identifiers in the set of disc identifiers is one of a compact disc (CD) identifier and a digital versatile disc (DVD) identifier;

for each of one or more of the individual children objects, maintaining a set of additional objects, wherein each additional object corresponds to a file associated with the track corresponding to the child object;

associating, for each of the one or more individual children objects, the set of additional objects with the child object, wherein the set of additional objects correspond respectively to a copy of an associated one of the tracks;

propagating, to the set of additional objects, any changes made to meta data corresponding to the child object; and

receiving an indication to change meta data associated with one track on the disc;

altering, in response to the indication, meta data associated with the child object corresponding to the one track; and

altering, in response to the indication, meta data associated with the additional object corresponding to the child object corresponding to the track.

47. (Previously Added) A memory as recited in claim 46, the computer program further being executable to cause the processor to perform acts comprising associating meta data with each child object and each additional object.

48. (Previously Added) A memory as recited in claim 46, wherein the disc identifier is formed using 64-bit Cyclical Redundancy Checking) of portions of the DVD.

49. (Previously Added) A memory as recited in claim 46, wherein the disc identifier is formed using 64-bit Cyclical Redundancy Checking) of portions of the DVD comprising a first 64 Kb of the DVD including one or more of: video_ts.ifo and vts_01_0.ifo.

(9) Evidence appendix. None

(10) Related proceedings appendix. None